

# **EXHIBIT C**

**From:** [Tenreiro, Jorge](#)  
**To:** [nicholas abadiotakis](#)  
**Cc:** [Brown, Nancy A](#)  
**Subject:** RE: SEC v. Gentile  
**Date:** Friday, September 11, 2020 2:01:00 PM

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Nick: Following up on the below. When will you be producing these emails to us?

Thanks.

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**From:** Tenreiro, Jorge <tenreiroj@SEC.GOV>  
**Sent:** Wednesday, September 02, 2020 6:13 PM  
**To:** nicholas abadiotakis <stockusatrust@gmail.com>  
**Cc:** Brown, Nancy A <BrownN@SEC.GOV>  
**Subject:** Re: SEC v. Gentile

Nick - we ask that you produce all six emails as they all fall under our subpoena and we can determine their relevance in the litigation

Thank you

On Sep 2, 2020, at 4:49 PM, nicholas abadiotakis <[stockusatrust@gmail.com](mailto:stockusatrust@gmail.com)> wrote:

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,  
Update to last email,  
The date of email #3 is 2/2017  
The date of email #4 is 9/2017  
The date of email # 5 is 02/2017  
And the last email #6 is 07/2017, not on previous email is from guy asking me to send a person named Micah, from Spartan , the financials from stockusa.

Regards,

Nick

Sent from my iPhone

On Aug 31, 2020, at 5:23 PM, Tenreiro, Jorge <[tenreiroj@sec.gov](mailto:tenreiroj@sec.gov)> wrote:

Nick: Ten days ago, you asked us for the weekend to do another search, and we also asked you to provide communications with the beneficiaries. You asked for the weekend, but we have not heard back. Please let us know when you expect to get back to us.  
Thank

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**From:** nicholas abadiotakis <[stockusatrust@gmail.com](mailto:stockusatrust@gmail.com)>

**Sent:** Thursday, August 20, 2020 1:30 PM

**To:** Tenreiro, Jorge <[tenreiroj@SEC.GOV](mailto:tenreiroj@SEC.GOV)>

**Cc:** Brown, Nancy A <[BrownN@SEC.GOV](mailto:BrownN@SEC.GOV)>

**Subject:** Re: SEC v. Gentile

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Jorge,

The trust document i provided lists who the beneficiary's are, and what role i have as the trustee.

I don't believe i have any communications in my possession that would show any administrative role the beneficiaries have in the underlying business. The business has management in place to run operations and make business decisions.

If you allow me this weekend to do another search to be certain, it would be appreciated.

Regards

Nick

Sent from my iPhone

On Aug 13, 2020, at 9:32 AM, Tenreiro, Jorge  
<[tenreiroj@sec.gov](mailto:tenreiroj@sec.gov)> wrote:

Nick:

Thank you for your email. To be clear, we want to confirm that the document you sent us is the only document in your possession, custody or control that is responsive to Request

No. 2. If that is the case, we request a response to Request No. 3, which calls for communications with the beneficial owners identified in Request No. 2. We are willing to narrow the request to communications that evidence what role the beneficiaries play in the administration of the trust's underlying business.

Please let me know if you'd like to discuss this narrowing of our requests.

Thank you,  
Jorge

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**From:** nicholas abadiotakis <[stockusatrust@gmail.com](mailto:stockusatrust@gmail.com)>

**Sent:** Wednesday, August 12, 2020 5:25 PM

**To:** Tenreiro, Jorge <[tenreiroj@SEC.GOV](mailto:tenreiroj@SEC.GOV)>

**Subject:** Re: SEC v. Gentile

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

I have already provided you with the Trust document that shows who the beneficiary's are.  
Did you not receive?

Nick

Sent from my iPhone

On Aug 12, 2020, at 1:57 PM, Tenreiro, Jorge  
<[tenreiroj@sec.gov](mailto:tenreiroj@sec.gov)> wrote:

Hi Mr. Abadiotakis:

I am following up yet again because we have not heard from you regarding our emails below. We are trying to set up a time to discuss these requests either with you or, if you

are represented by counsel, through counsel.  
Please let us know how you'd like to proceed.

In terms of your request to "narrow . . . down" the request. We do not agree that our request is broad or burdensome. Nevertheless, in the interest of compromise, please provide us in the first instance with all documents responsive to Request No. 2, which requests documents relating to the identity of the legal owners or beneficiaries of Stock USA Trust. Please provide us those documents in the first instance by this Friday, and we can discuss what else may be needed.

Again, if you have retained an attorney in connection with this matter please let us know and please provide us his or her contact information. Please be advised that we are contemplating seeking relief from the Magistrate Judge assigned to this matter given your failure to respond to these emails.

Thanks,

Jorge

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**From:** Tenreiro, Jorge  
**Sent:** Friday, August 07, 2020 1:53 PM  
**To:** 'nicholas abadiotakis'  
<[stockusatrust@gmail.com](mailto:stockusatrust@gmail.com)>  
**Cc:** Brown, Nancy A <[BrownN@SEC.GOV](mailto:BrownN@SEC.GOV)>  
**Subject:** RE: SEC v. Gentile

Nick:

I am a bit confused by your email below. In your email on Tuesday, which is below this thread and which I attach for your convenience, you indicated that you wanted an attorney to advise you with respect to my request that we speak on the phone. In your email below you stated that you "have not yet retained an attorney." Before I can respond substantively to your email below, please, by

the end of today, either send us the contact information of the attorney you are hiring, or confirm that you are now willing to discuss these issues with us without an attorney.

Thank you very much,

Jorge

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**From:** nicholas abadiotakis  
<[stockusatrust@gmail.com](mailto:stockusatrust@gmail.com)>  
**Sent:** Friday, August 07, 2020 1:40 PM  
**To:** Tenreiro, Jorge <[tenreiroj@SEC.GOV](mailto:tenreiroj@SEC.GOV)>  
**Subject:** Re: SEC v. Gentile

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Jorge,

I have not yet retained an attorney. As i have stated prior, I would be happy to provide you with any documents pertaining to the scope of your litigation with Guy Gentile. Your current request is extremely broad and burdensome. If you could narrow it down or tell me what type of information or documents you are seeking, i can search for them. If your litigation is in reference to KYUS and raven gold, which i believe it is, i have no information whatsoever to provide. In fact this trust, which i provided to you, was set up many years after in December 2011. So again, if you let me know what specific information you are seeking, i would be happy to search for them.

Regards

Nick

Sent from my iPhone

On Aug 7, 2020, at 11:06 AM,

Tenreiro, Jorge  
<[tenreiroj@sec.gov](mailto:tenreiroj@sec.gov)> wrote:

Hi Mr. Abadiotakis,

Please provide us your counsel's contact by the end of today, and I kindly ask that you forward him or her this email. In light of your responses to our subpoena, we may need to seek an order from the Court compelling a full response, and we need to meet and confer with you via counsel in advance of seeking such relief.

Thank you.

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**From:** nicholas abadiotakis  
<[stockusatrust@gmail.com](mailto:stockusatrust@gmail.com)>  
**Sent:** Tuesday, August 04, 2020  
7:23 PM  
**To:** Tenreiro, Jorge  
<[tenreiroj@SEC.GOV](mailto:tenreiroj@SEC.GOV)>  
**Subject:** Re: SEC v. Gentile

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Your request is extremely broad, if you were to narrow your request to whatever your litigation is in reference to, i would be obliged to comply. As for speaking to you this week, i would need to have an attorney advise.

Regards

Nick

Sent from my iPhone

On Aug 3, 2020, at  
3:55 PM, Tenreiro,  
Jorge  
<[tenreiroj@sec.gov](mailto:tenreiroj@sec.gov)>  
wrote:

Hi Nick:

We are following  
up. When can we  
speak about your  
response to the  
subpoena? Please  
provide a time to do  
so this week.

Thanks,

Jorge